

Exhibit A

(State Court Documents)

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
COUNTY OF HAMPTON)	CIVIL ACTION NO.: 2021-CP-25-_____
ANN F. BECKETT,)	
Plaintiff,)	SUMMONS
	<i>(Jury Trial Demanded)</i>
v.)	
CHARLES CHRISTOPHER RUFF AND)	
SYSCO COLUMBIA, LLC,)	
Defendants.)	

TO THE DEFENDANTS ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the complaint herein, a copy of which is herewith served upon you, and to serve a copy of your answer to this complaint upon the subscriber, at Peters, Murdaugh, Parker, Eltzroth & Detrick, PA, 101 Mulberry Street East, P.O. Box 457, Hampton, SC 29924, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the complaint, judgment by default will be rendered against you for the relief demanded in the complaint.

PETERS, MURDAUGH, PARKER, ELTZROTH
& DETRICK, P.A.

BY: /s/ William F. Barnes, III
 William F. Barnes, III
 SC Bar No.78220
 101 Mulberry Street East
 P.O. Box 457
 Hampton, SC 29924
 Phone: (803) 943-2111
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 wbarnes@pmped.com

ATTORNEYS FOR PLAINTIFF

September 16, 2021
 Hampton, South Carolina

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
COUNTY OF HAMPTON) CIVIL ACTION NO.: 2021-CP-25-
)
ANN F. BECKETT,)
)
Plaintiff,) **COMPLAINT**
) *(Jury Trial Demanded)*
)
v.)
)
CHARLES CHRISTOPHER RUFF AND)
SYSCO COLUMBIA, LLC,)
Defendants.)

The Plaintiff alleges:

1. The Plaintiff, Ann F. Becket ("Beckett"), is a citizen and resident of Hampton County, South Carolina.
2. The Defendant, Charles Christopher Ruff ("Ruff"), is upon information and belief, a citizen and resident of Richland County, South Carolina.
3. The Defendant, SYSCO Columbia, LLC, is a foreign corporation organized, existing, and maintaining its principal place of business in a state other than South Carolina.
4. At all times herein mentioned below, Charles Christopher Ruff was an officer, agent, servant and/or employee acting within the course and scope of his employment with SYSCO Columbia, LLC. SYSCO Columbia is liable for Mr. Ruff's acts and/or omissions.
5. On November 22, 2019, the Plaintiff was operating her vehicle in a westerly direction on S.C. Highway 3 in Hampton County, South Carolina and had her right turn signal activated as she prepared to make a right-turn.
6. At the same time and place, Defendant Ruff was also traveling in a westerly direction on S.C. Highway 3 in Hampton County, South Carolina behind the Plaintiff when, as Plaintiff was making a right-hand turn, the Defendant attempted to make an illegal pass on the right side of the roadway causing the two vehicles to collide.

7. The collision caused Ms. Beckett to suffer serious, severe and permanent injuries as set forth below.

8. Plaintiff's injuries were due to and proximately caused by the negligent, careless, reckless, willful, and wanton conduct of the Defendant in the following particulars:

- a) In driving too fast for conditions then and there prevailing;
- b) In failing to keep a proper lookout;
- c) In failing yield to the right-of-way;
- d) In failing to pass properly;
- e) In failing to exercise that degree of care that a reasonably prudent person would have exercised under the same or similar circumstances;
- f) In violating S.C. Code Ann. § 56-5-1840; and
- g) In such other particulars as the evidence may establish.

9. As a result of the aforementioned accident, Plaintiff suffered severe and permanent injuries from which she has suffered and will continue to suffer physical pain and mental anguish; and has expended and will in the future expend, monies for medical care and treatment, and caused to lose the enjoyment of life.

10. By reason of and in consequence of the above-mentioned negligent, careless, reckless, willful, and wanton conduct of the Defendants, Plaintiff suffered the injuries, losses, and damages complained of, for which the Defendants are liable.

WHEREFORE, Plaintiff prays for judgment against the Defendants for actual damages, together with punitive damages in an appropriate amount, for the costs of this action, and for such other and further relief as the Court may deem just and proper.

-Signature Page to Follow-

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